

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE  
ER REGULATORY CONTACT RECORD**

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**Date/Time:** June 9, 2005 / 10:00 a.m.

**Site Contact(s):** K-H: Karen Wiemelt, Susan Serreze

**Phone:** 303-692-2035 – CDPHE  
303/312-6312 - EPA  
303/966-4226 – DOE

**Agency:** CDPHE: Harlen Ainscough, Elizabeth Pottorff, Carl Spreng  
EPA: Sam Garcia, Larry Kimmel  
DOE: Norma Castañeda

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**Purpose of Contact:** A meeting was held on June 9, 2005 to discuss the Draft Closeout Report for IHSS Group 900-2 and 100 Area HRR Write ups, and 300 Area HRR Write up

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**Discussion:** See meeting minutes below.

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**Contact Record Prepared By:** Susan Serreze

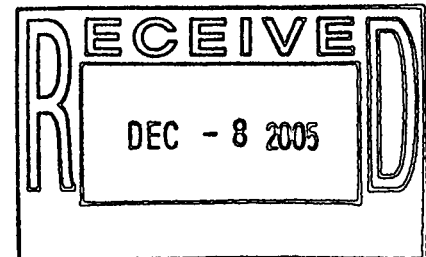
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**June 9, 2005 Comment Resolution Meetings  
For  
Draft Closeout Report IHSS Group 900-2  
100 Area HRR Write ups  
300 Area HRR Write ups**

A meeting was held on June 9, 2005 to discuss the Draft Closeout Report for IHSS Group 900-2 and 100 Area HRR Write ups, and 300 Area HRR Write up

Attendees

CDPHE: Harlen Ainscough, Elizabeth Pottorff, Carl Spreng  
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel (Greystone)  
U.S. Fish and Wildlife: Mark Sattelberg  
DOE: Norma Castaneda  
K-H Team: Karen Wiemelt, Laura Brooks, Chris Dayton, Susan Serreze



Report Status

ADMIN RECORD

BZ-A-000911

1/9

The Draft Nature and Extent of Groundwater Contamination report was handed out by Laura Brooks.

#### Issues

No Sitewide issues were discussed.

#### Specific Comments

##### **Draft Closeout Report for IHSS Group 900-2**

Photographs and figures of the french drain, gravel drain, and functional channel were handed out.

Additional comments from EPA were discussed and the following resolutions were agreed to:

1. Add text to describe why more dioxin samples were not collected.
2. Figure 2 will be reviewed to assure that all results are on the map.
3. Text will be added to note that re-packaging is complete.

##### **100 Area HRR Write up**

The attached written comments were received from CDPHE. The following resolutions were agreed to:

All comments will be addressed as stated. There was no further discussion.

##### **300 Area HRR Write up**

The attached written comments were received from CDPHE. There was discussion on PAC 300-156.1 comment number 1. All other comments will be addressed as stated.

##### **PAC 300-156.1**

1. PRGs and PPRGs will be explained in the HRR introduction.

#### **Other Issues**

There were no other issues.

#### **V. Meetings**

The next meeting will be held on June 23, 2005 at 10:00 AM in the Breckenridge Room.

**Colorado Department of Public Health and Environment**

**Hazardous Materials & Waste Management Division**

**Comments**

**Draft**

**PAC REFERENCE NUMBERS:**

**100-148, -600, -601, -603, -604, -605, -606, -607, -608, -609, -610, -611, -612, -613**

**Comprehensive**

**Historical Release Report**

**2005**

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**Specific Comments:**

**100-148:** No comments

**100-600:**

1. **PAC Investigations:** The text refers to three more times as being Phases 1 through 3. Was the initial excavation not considered, at the time, as a phase?

**100-601:**

1. **PAC Investigations:** The Historical Summary states that approximately a gallon of acid leaked, yet the PAC Investigation was limited to a recommendation to dispose of the remaining acid. Please include, to the extent possible, the basis for NFA under these conditions. Perhaps minutes of the November 14, 2001 meeting would be helpful. If not, perhaps a general rationale under RFA Recommendation, i.e., dilution, minimal quantity, could be added to the summary.
2. **References:** Please date sequence the references.

**100-603:**

1. The primary comment to PAC 100-601 may best be resolved by using this PACs narrative as a guide.

**100-604:** No comments

**100-605:** No comments

**100-606:** No comments

**100-607:** No comments

**100-608:** No comments

**100-609:** No comments

**100-610:** No comments

**100-611:** No comments

**100-612:** No comments

**100-613:** No Comments

**Colorado Department of Public Health and Environment**

**Hazardous Materials & Waste Management Division**

**Comments**

**Draft**

**PAC REFERENCE NUMBERS:**

**300-128, -134NS, -135, -151, -156-1, -171, -181, -186, -188, -206, -212, -700 thru -715**

**Comprehensive**

**Historical Release Report**

**2005**

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**Specific Comments:**

**300-128:**

1. **No Further Accelerated Action Recommendation:** In the second sentence of the section, please insert "further" before "indicated". Surface soils below WRW and the SSRS are the justification for NFAA, not the SSRS alone.
2. Please reference the Gunderson/DiSalvo letter as "CDPHE 2003", not as if personal.
3. **References:** The June 20, 2003 Gunderson/DiSalvo letter is not personal and should be listed under CDPHE comparable to the December 1, 2004 approval letter.

**300-134N:**

1. **Historical Summary:** Please delete the errant "900-" in the second paragraph.
2. In the first full paragraph of page 2, please remove reference to IHSS 134S to remain consistent with the stated intent to discuss each IHSS separately.
3. **No Further Accelerated Action Recommendation:** The NFAA decision should also be based on the OU-13 data, not merely the accelerated action data. The value of 100,000 ug/L, on a ppm equivalent basis below the WRW value of 615000 ug/kg, should be discussed.
4. Again, please remove reference to IHSS 134S.

**300-134S:**

1. **Historical Summary:** The text in the second paragraph is nearly identical to the information presented in the second and third paragraphs under Historical Summary for IHSS 300-134N. It appears to be an inadvertent addition that in turn contradicts the information, presented in the third paragraph of the 134S history. If Fire Department

personnel interviews were contradictory, as indicated, acknowledge the fact clearly and state how the issue was addressed (conservatively we trust) from a sampling plan perspective. (The lithium burn injury to the fireman and lithium burning in the B331 parking lot, noted in the fourth paragraph, appear significant.)

2. **No Further Accelerated Action Recommendation:** The NFAA decision should also be based on the OU-13 data, not merely the accelerated action data.
3. Please reference the Gunderson/DiSalvo letter as "CDPHE 2003", not as if personal.
4. **References:** The June 20, 2003 Gunderson/DiSalvo letter is not personal and should be listed under CDPHE comparable to the December 1, 2004 approval letter.

**300-135:**

1. **OU8 RFI/RI Activities:** Rather than merely discussing constituents that exceeded background, note that chromium was less than background.

**300-151:**

1. **No Further Accelerated Action Recommendation:** Check "was therefore was" construction.

**300-156.1:**

1. **No Further Accelerated Action Recommendation:** The following table shows 1995 PPRGs. Therefore, values "below" PPRGs are unclear, unless all results were below 2.5 pCi/g Pu239/240. Please summarize the data in the document for further comparison.

PRGs ( $10^{-6}$  excess cancer risk) in pCi/g

Radionuclide	Resident	Office Worker	Open Space User	Construction Worker (subsurface)	Ecological Worker
<b>1995:</b>					
Am-241	1.9	7.7	23.6	164	110
Pu-239/240	2.5	10.1	69.8	220	183
<b>2000:</b>					
Am-241	1.9	8.0	15.8		
Pu-239/240	2.5	10.0	17.5		

**300-171:**

1. **No Further Accelerated Action Recommendation:** Delete errant "he" from the first sentence.
2. Please reference the Gunderson/DiSalvo letter as "CDPHE 2003", not as if personal.

- 3. References:** The June 20, 2003 Gunderson/DiSalvo letter is not personal and should be listed under CDPHE comparable to the December 1, 2004 approval letter.

**300-181:**

No comments

**300-186:**

No comments

**300-188:**

- 1. No Further Accelerated Action Recommendation:** In the second bullet, please change "required" to "necessary". (The Division would prefer that this recurring comment not be necessary.)

**300-206:**

No Comments

**300-212:**

No Comments

**300-700:**

No Comments

**300-701:**

No Comments

**300-702:**

No Comments

**300-703:**

No Comments

**300-704:**

No Comments

**300-705:**

No Comments

**300-706:**

No Comments

**300-707:**

No Comments

**300-708:**

No Comments

**300-709:**

No Comments

**300-710:**

No Comments

**300-711:**

No Comments

**300-712:**

No Comments

**300-713:**

No Comments

**300-714:**

No Comments

**300-715:**

1. **Historical Summary:** The term "Total CLP Metals" is unclear. The "T" of TCLP is "Toxic" not "Total. If total metals results were obtained from the soil samples, then it is not a TCLP result. If metals were derived from a TCLP leachate, then "TCLP Metals" not "Total CLP Metals" is appropriate.



Required Distribution:

M. Aguilar, USEPA  
S. Bell, DOE-RFFO  
J. Berardini, K-H  
B. Birk, DOE-RFFO  
L. Brooks, K-H ESS  
M. Broussard, K-H RISS  
L. Butler, K-H RISS  
G. Carnival, K-H RISS  
N. Castaneda, DOE-RFFO  
C. Deck, K-H Legal  
S. Gunderson, CDPHE  
M. Keating, K-H RISS  
G. Kleeman, USEPA  
D. Kruchek, CDPHE  
D. Mayo, K-H RISS

Additional Distribution:

R. McCallister, DOE-RFFO  
J. Mead, K-H ESS  
S. Nesta, K-H RISS  
L. Norland, K-H RISS  
K. North, K-H ESS  
E. Pottorff, CDPHE  
A. Primrose, K-H RISS  
R. Schassburger, DOE-RFFO  
S. Serreze, K-H RISS  
D. Shelton, K-H ESS  
C. Spreng, CDPHE  
S. Surovchak, DOE-RFFO  
K. Wiemelt, K-H RISS  
C. Zahm, K-H Legal

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